

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LEADENHALL CAPITAL PARTNERS LLP  
and LEADENHALL LIFE INSURANCE  
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

vs.

JOSH WANDER, STEVEN PASKO,  
KENNETH KING, 777 PARTNERS LLC,  
600 PARTNERS LLC, SPLCSS III LLC,  
SIGNAL SML 4 LLC, INSURETY AGENCY  
SERVICES LLC, DORCHESTER  
RECEIVABLES II LLC, SUTTONPARK  
CAPITAL LLC, SIGNAL MEDICAL  
RECEIVABLES LLC, INSURETY CAPITAL  
LLC, SUTTONPARK SERVICING LLC,  
SIGNAL SERVICING LLC, INSURETY  
SERVICING LLC, and ADVANTAGE  
CAPITAL HOLDINGS LLC,

Defendants.

Civil Action No. 1:24-cv-03453

**DECLARATION OF LEIGH M. NATHANSON**

I, Leigh M. Nathanson, declare under penalty of perjury that the following statements are true and correct:

1. I am an attorney licensed and admitted to practice in the state of New York and a partner at King & Spalding LLP, counsel for Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investment Fund PLC (collectively, “Leadenhall” or “Plaintiffs”).

2. I submit this Declaration in support of Leadenhall’s proposed Order to Show Cause seeking as to Defendants 777 Partners, 600 Partners, and the Borrowers (together, the “Borrowers

and Guarantors”<sup>1</sup>): (1) the appointment of a receiver pursuant to Rule 66 of the Federal Rules of Civil Procedure to take possession, custody, and control of the assets of the Borrowers and Guarantors as specified in the proposed Order to Show Cause, and otherwise to take action as specified in the proposed Order to Show Cause; or, in the alternative, (2) a prohibition pursuant to Rule 64 or 65 of the Federal Rules of Civil Procedure on the sale, transfer, pledge, or encumbrance of the assets owned by the Borrower or in which the SuttonPark or Dorchester Borrower has any security interest, and otherwise to prohibit as to the Borrowers and Guarantors the acts set forth in the proposed Order to Show Cause.

3. This declaration is also submitted in support of Leadenhall’s application for a temporary restraining order prohibiting the Borrowers and Guarantors from committing any of the acts set forth in Paragraph (2) of the proposed Order to Show Cause pending a hearing and decision on the Order to Show Cause.

4. A Complaint was filed in this action on May 3, 2024.

5. Leadenhall’s application is brought by Order to Show Cause rather than by Notice of Motion because swift action is required to prevent Defendants from causing Leadenhall irreparable harm by becoming insolvent to prevent Leadenhall from enforcing any judgment against Defendants in this litigation.

6. Attached hereto as Exhibits A through P, as delineated below, are true and correct copies of the operative pleadings in the following actions against Defendants:

A. *Change Lending LLC v. 777 Partners LLC et al.*, Index No. 650118/2024 (N.Y. Sup.);

B. *Corvus Lights Aviation et al v. 777 Partners LLC* (U.K.);

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<sup>1</sup> Capitalized terms shall have the same meaning as set forth in the proposed Order to Show Cause.

- C. *MALT Family Trust et al. v. 777 Partners, LLC et al.*, C.A. No. 2022-0652-MTZ (Del. Ch.);
- D. *Vida Longevity Fund, LP et al. v. Suttonpark Capital LLC et al.*, Index. No. 656715/2022 (N.Y. Sup.);
- E. *Obra Capital Management, LLC et al. v. 777 Partners LLC et al.*, Index No. 651220/2024 (N.Y. Sup.);
- F. *Balanced Management LLC v. 777 Partners LLC*, Case No. 230909460 (Utah Dist. Ct.);
- G. *Nakula Management Ltd. v. Joshua Wander et al.*, Case No. 2024-004624-CA-01 (Fla. 11th Cir. Ct.) (exhibits to the complaint are excluded);
- H. *1 Madison Office Fee LLC v. 777 Partners LLC et al.*, Index No. 654397/2023 (N.Y. Sup.);
- I. *Lasse Meilsoe v. 777 Partners LLC et al.*, Case No. 2023-028758-CA-01 (Fla. 11th Cir. Ct.);
- J. *Peter Meyers v. 777 Partners, LLC et al.*, Case No. 2024-001279-CA-01 (Fla. 11th Cir. Ct.);
- K. *American Express Travel Related Services Company, Inc. v. 777 Partners LLC*, 651130/2023 (N.Y. Sup.);
- L. *Randy S. Gelber v. Joshua Wander*, Case No. 2021-013205-CA-01 (Fla. 11th Cir. Ct.);
- M. *The Oxbridge Group, LTD v. 777 Partners, LLC*, Index No. 651975/2023 (N.Y. Sup.);

N. *O'Neil-Dunne et al. v. Phoenicia LLC et al.*, C.A. No. 2023-0987-BWD (Del. Ch.);

O. *Eido Hussam Al-Nahhas v. 777 Partners, LLC et al.*, Case No. 22-cv-750 (N.D. Ill.); and

P. *Joseph Morgan et al. v. 777 Partners, LLC et al.*, Case No. 24-cv-01004 (N.D. Ill.).

7. On May 13, 2024, I emailed outside counsel representing Defendants and, for certain Defendants, counsel which has instructed us to communicate with them pending those Defendants' retention of outside counsel, informing them that Leadenhall is filing this proposed Order to Show Cause seeking (i) a temporary restraining order, and (ii) a receivership or, in the alternative, a preliminary injunction. I further informed counsel that we intend to email them copies of all of the papers we are now filing in support of this proposed Order to Show Cause once they have been filed.

8. The Borrowers and Guarantors will not suffer any legally cognizable harm from the issuance of a temporary restraining order and, ultimately, a preliminary injunction seeking the appointment of a receiver or, in the alternative, the freezing of assets sufficient to cover the Accelerated Debt.

9. There has been no prior request for the emergency relief requested in this proposed Order to Show Cause.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 13, 2024

/s/ Leigh M. Nathanson  
Leigh M. Nathanson